

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOHN DOE, et al.,

Plaintiffs,

v.

DONALD TRUMP, et al.,

Defendants.

CASE NO. C17-0178JLR

PLAINTIFFS' MOTION TO SEAL

JEWISH FAMILY SERVICE, et al.,

Plaintiffs,

v.

DONALD TRUMP, et al.,

Defendants.

CASE NO. C17-1707JLR

(RELATING TO BOTH CASES)

1 Plaintiffs respectfully move for leave to file under seal unredacted versions of their Joint
2 Letter re: Privilege Disputes Arising in Depositions (February 19, 2019) (“Joint Letter”) and
3 Exhibit A to the Joint Letter. Unredacted versions of these documents have been provisionally
4 filed under seal simultaneously with the filing of this Motion.

5 This Motion is made on the grounds that Exhibit A is an excerpt of testimony from the
6 deposition of Jennifer B. Higgins, the Associate Director for the Refugee Asylum and International
7 Operations Director at the United States Department of Homeland Security, that Defendants
8 believe contains confidential material under Section 2 of the January 31, 2019 Protective Order
9 (Dkt. No. 177). Likewise, the Joint Letter cites portions of Exhibit A that Defendants believe are
10 confidential under Section 2 of the January 31, 2019 Protective Order. Though Plaintiffs do not
11 believe that the testimony provided by Ms. Higgins reveals any protected information because the
12 information referenced is publicly available, in an abundance of caution, Plaintiffs have submitted
13 unredacted versions of the Joint Letter and Exhibit A under seal and have filed redacted versions
14 of the Joint Letter and Exhibits A on the public docket understanding that Defendants bear the
15 burden to justify maintaining these documents under seal.

16 The undersigned certifies that Plaintiffs and Defendants met and conferred regarding this
17 motion to seal on February 19, 2019 and were able to reach an agreement that portions of Exhibit
18 A should be redacted rather than filed under seal in its entirety. This conference took place via
19 email between Mariko Hirose, counsel for Plaintiffs, and Joe Dugan, counsel for Defendants, with
20 the undersigned copied.

21 Plaintiffs request that the unredacted versions of Joint Letter re: Privilege Disputes Arising
22 in Depositions (February 19, 2019) and Exhibit A to the Joint Letter re: Privilege Disputes Arising
23 in Depositions (February 19, 2019) be sealed from public view.

Respectfully submitted,

s/ Lauren Watts Staniar

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DATED: February 19, 2019

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CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2019, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all of the registered CM/ECF users for this case.

DATED this 19th day of February, 2019.

/s/ Lauren Watts Staniar